Sieminski, John P.

From: Sieminski, John P.
Sent: Wednesday, August 08, 2007 12:40 PM
To: tereilly@tomreillylaw.com
Subject: Emailing: Stipulation to Enforce Judgment - 8-8-07 revision (WRS v. Herklotz)

Attachments: Stipulation to Enforce Judgment - 8-8-07 revision.doc

Stipulation to
Enforce Judgmen...

Tom:

Please call me to discuss the attached after you have had a chance to review it.

Thanks,
John

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EXHIBIT
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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

WRS, INC. d/b/a WRS MOTION PICTURE LABORATORIES, a corporation, Plaintiff, vs. PLAZA ENTERTAINMENT, INC., a corporation, ERIC PARKINSON, an individual, CHARLES von BERNUTH, an individual and JOHN HERKLOTZ, an individual, Defendants	)	C.A. No. 00-2041

STIPULATION PURSUANT TO F.R.C.P. 62(d) FOR AN ORDER STAYING PROCEEDINGS TO ENFORCE JUDGMENT PENDING APPEAL

This Stipulation is made and executed by and between, Plaintiff, WRS, Inc., and Defendant, John Herklotz, by and through their respective counsel, Thomas E. Reilly and John Sieminski.

RECITALS

WHEREAS, by Order of February 20, 2007, the United States District Court for the Western District of Pennsylvania entered Judgment in the above matter in favor of WRS, Inc. and against Defendant, Herklotz, in the sum of $2,584,749.03; and

WHEREAS, Defendant, Herklotz, appealed the Judgment to the United States Court of Appeals for the Third Circuit where the appeal is pending at Case No. 07-1712; and

WHEREAS, Defendant, Herklotz, desires to have proceedings to enforce the aforesaid Judgment stayed pending the appeal; and